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TIMOTHY B. FLEMING
OF COUNSEL

December 27, 2019

The Honorable Sarah Netburn
United States Magistrate Judge
U.S. District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: *In Re Terrorist Attacks on September 11, 2001*, 1:03-md-01570 (GBD)(SN)
Havlish, et al. v. bin Laden, et al., 1:03-cv-09848 (GBD)(SN)
Hoglan, et al. v. Iran, et al., 1:11-cv-07550 (GBD)(SN)
Ray, et al. v. Iran, et al., 1:19-cv-00012 (GBD)(SN)
Letter Motion for Extension of Time**

Dear Magistrate Judge Netburn:

Counsel for the *Havlish* Plaintiffs in the above-captioned MDL write to respectfully request a brief extension of time in which to respond to The Federal Plaintiffs' Memorandum of Law in Support of their proposal concerning the establishment and allocation of the Common Benefit Fund and for reconsideration of the Court's September 30, 2019 Common Benefit Fund Decision, or, in the alternative, in support of objections to the Court's September 30, 2019 Opinion and Order pursuant to Fed. R. Civ. P. 72 (MDL Docket No. 5359), and the PEC's Motion for Reconsideration and/or Clarification of Decision Establishing a Common Benefit Fund Solely in Favor of *Havlish* Counsel. (MDL Docket No. 5361).

Because, in large part, of the holiday season, counsel for the *Havlish* Plaintiffs request until January 3, 2020 to oppose it otherwise respond. Said opposition would be otherwise due today. Any reply by the PEC and the Federal Insurance Group parties would be due January 14, 2020, with a reservation of rights to ask for a further extension, if needed.

The undersigned counsel has communicated with counsel of record for those parties that are responsible on this issue, and they have consented to these revised deadlines. This is

BIRMINGHAM, AL
DELAND, FL
NASHVILLE, TN
WASHINGTON, D.C.

Hon. Sarah Netburn.
United States Magistrate Judge
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our first request for an extension of time on these papers. Accordingly, we request that Your Honor "so order" this request.

Thank you very much for your consideration of this letter request.

Sincerely,

A handwritten signature in cursive script, reading "Timothy B. Fleming". The signature is written in black ink and is positioned above the printed name.

Timothy B. Fleming

TF/t3

CC: All counsel of record via ECF